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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

GANESH SANKAR, ERIKA TITUS-LAY,  
JARED CAVANAUGH, AND KIMBERLY  
VONGNALITH, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

CALIFORNIA NORTHSTATE  
UNIVERSITY, LLC,

Defendant.

Lead Case No. 2:24-cv-00473-DAD-JDP  
Member Case No. 2:24-cv-01231-DAD-  
JDP

**JOINT STATUS REPORT REGARDING SETTLEMENT**

Plaintiffs Ganesh Sankar, Erika Titus-Lay, Jared Cavanaugh, and Kimberly Vongnalith  
("Plaintiffs") and Defendant California Northstate University, LLC ("Defendant") (collectively,

the “Parties”), through their undersigned counsel, submit this Joint Status Report pursuant to the Court’s January 22, 2025 Order. ECF No. 37.

On January 21, 2025, the Parties notified the Court that they had reached an agreement on the material terms of a class settlement. ECF No. 36. The Court subsequently set a deadline of February 11, 2025 for the Parties to file the Motion for Preliminary Approval, or submit a joint status report regarding settlement progress. ECF No. 37.

Since notifying the Court of the settlement, the Parties have been diligently working to finalize the settlement agreement and related exhibits, including class notices, reviewing bids for notice and settlement administration, and preparing other supporting documents for the motion for preliminary approval.

Several drafts of the settlement documents have been exchanged between the Parties and the Parties are near completion on all settlement documents. The Parties anticipate completing all settlement documents within the next 14 days, and Plaintiffs anticipate filing a motion for preliminary approval no later than February 25, 2025.

WHEREFORE, the Parties respectfully request that the Court grant Plaintiffs until February 25, 2025, to file a motion for preliminary approval of the class settlement or the Parties shall provide the Court with a joint status report on settlement at that time.

Dated: February 10, 2025

Respectfully submitted,

**For Plaintiffs:**

**For Defendant:**

By: /s/Andrew G. Gunem  
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By: /s/ Bethany G. Lukitsch  
(as authorized on 2/09/2025)  
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**ATTESTATION**

I, Andrew G. Gunem, am the ECF user whose identification and password are being used to file this Stipulation. I hereby attest that Bethany G. Lukitsch, attorney for Defendant, has concurred in this filing.

Dated: February 10, 2025

By: /s/ Andrew G. Gunem

**(PROPOSED) ORDER**

Based on the parties' Joint Status Report on Settlement,

IT IS HEREBY ORDERED that Plaintiffs shall move for preliminary approval of the class settlement or the Parties shall provide the Court with a joint status report on settlement by February 25, 2025.

IT IS SO ORDERED

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